

1 The Honorable Marsh J. Pechman  
2  
3  
4  
5  
6

7 UNITED STATES DISTRICT COURT OF WASHINGTON  
8 AT WESTERN DISTRICT SEATTLE

9 JULIE DALESSIO, an individual,  
10 Plaintiff,

11 v.  
12 UNIVERSITY OF WASHINGTON, et. al.  
13 Defendants.

No. 2:17-cv-00642 MJP

DEFENDANTS' SECOND  
SUPPLEMENTAL INITIAL  
DISCLOSURES

14 COME NOW DEFENDANTS, by and through counsel of record Special Assistant  
15 Attorney General Jayne L. Freeman and make the following Second Supplemental Initial  
16 disclosures required by Federal Rule of Civil Procedure 26(a)(1) based on information  
17 available to Defendants to date. Defendants reserve the right to supplement this initial  
18 disclosure as discovery is conducted and disclosures are made by Plaintiff.

19 **I. RULE 26(A)(1)(A)(I) THE NAME AND, IF KNOWN, THE ADDRESS AND  
20 TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE  
21 DISCOVERABLE INFORMATION—ALONG WITH THE SUBJECTS OF THAT  
INFORMATION—THAT THE DISCLOSING PARTY MAY USE TO SUPPORT  
ITS CLAIMS OR DEFENSES, UNLESS THE USE WOULD BE SOLELY FOR  
IMPEACHMENT.**

22 The following individuals are likely to have discoverable information, which  
23 Defendant may use to support its claims or defenses. Disclosure of various individuals  
24 does not reflect Defendants agreement as to whether certain information, evidence, or  
25 issues are actually relevant or material to claims or theories as advanced by Plaintiff or  
26 defenses necessary to respond to said claims. Defendants reserve the right to object to

27 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
DISCLOSURES - 1

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1 discovery related to matters outside the scope of FRCP 26, or immaterial to legal defenses  
2 and arguments upon which Defendants may rely to defend against claims and theories set  
3 forth in Plaintiff's First Amended Complaint.

4 1. Alison Swenson, Compliance Analyst (since July 2014)  
5 c/o Keating, Bucklin & McCormack, Inc., P.S.  
6 800 5<sup>th</sup> Avenue, Suite 4141  
7 Seattle, WA 98104  
206.623.8861

8 Ms. Swenson prepared the responses to public records requests cited by Plaintiff in  
9 her Complaint. She has knowledge of the redaction process and the facts regarding the  
10 public records productions at issue in this case and communications with Plaintiff.

11

- 12 • Ms. Swenson sent out search requests for responsive records and prepared a  
13 response to PRR-16-00283. See, UW001982-UW00183, UW000779-  
14 UW000787, UW00194-UW00185, UW001991-UW002000.
- 15 • Ms. Swensen sent out search requests for records responsive to PRR-2015-  
16 00570 and prepared responsive records and an exemption log for documents  
17 withheld. See, UW00004-UW000392, UW002001-0020131,

18 2. Julie Dalessio  
19 1110 29th Ave.  
20 Seattle, WA 98122  
21 (206) 324-2590

22 Ms. Dalessio is the plaintiff in this case and has knowledge of facts regarding the  
23 allegations in her Complaint.

24 3. Robert Kosin, Assistant Attorney General  
25 University of Washington Attorney General's Office  
c/o Keating, Bucklin & McCormack, Inc., P.S.  
800 5<sup>th</sup> Avenue, Suite 4141  
Seattle, WA 98104  
206.623.8861

26 Mr. Kosin has knowledge of regarding a contact with Plaintiff in 2016. Mr. Kosin

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1 may also have knowledge of privileged attorney client communications and/or work  
2 product. By disclosing AAG Kosin as an individual with knowledge of some non-  
3 privileged information, the University does not in any way intend to waive any applicable  
4 privileges that may apply.

5       4.     David Betz  
6           1325 4<sup>th</sup> Avenue Suite 1400  
7           Seattle, WA 98101-2573  
8           (206) 457-4121

9       Mr. Betz has knowledge of facts regarding a public records request he made to the  
10      University of Washington, and the adverse possession lawsuit regarding which Plaintiff  
11      alleges some of her damages arise.

12       5.     Perry Tapper  
13           Public Records Compliance Officer (Since September 2013)  
14           Office of Public Records and Open Public Meetings  
15           c/o Keating, Bucklin & McCormack, Inc., P.S.  
16           800 5<sup>th</sup> Avenue, Suite 4141  
17           Seattle, WA 98104  
18           206.623.8861

19       Mr. Tapper has knowledge of Plaintiff's contact with the Office of Public Records.

20       6.     Eliza Saunders  
21           Director of the Office of Public Records (Since September 2013)  
22           Office of Public Records and Open Public Meetings  
23           c/o Keating, Bucklin & McCormack, Inc., P.S.  
24           800 5<sup>th</sup> Avenue, Suite 4141  
25           Seattle, WA 98104  
26           206.623.8861

27       Ms. Saunders has knowledge of the University's Public Records Office operations,  
28      policies, and procedures.

29       7.     Barb Benson  
30           Records Management Services (Since July 2013)  
31           c/o Keating, Bucklin & McCormack, Inc., P.S.  
32           800 5<sup>th</sup> Avenue, Suite 4141  
33           Seattle, WA 98104  
34           206.623.8861

35       Ms. Benson has knowledge regarding records retention policies at the University of  
36      DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
37      DISCLOSURES - 3  
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1 Washington.

2 8. Lumilla Barbacar, Civil Rights Investigator  
3 Washington State Human Rights Commission  
4 711 South Capitol Way, Suite 402  
5 P.O. Box 42490  
6 Olympia, WA 98504-2490  
7 (360) 359-4921

8 Ms. Barbacar has knowledge regarding a complaint Plaintiff filed with the Human  
9 Rights Commission in 2016 and communications with Plaintiff regarding it.

10 9. Laura Skinner, Executive Asst. to the Commissioners  
11 Washington State Human Rights Commission  
12 711 South Capitol Way, Suite 402  
13 P.O. Box 42490  
14 Olympia, WA 98504-2490  
15 (360)359-4921

16 Ms. Skinner has knowledge regarding a petition for reconsideration filed with the  
17 Human Rights Commission by Plaintiff and communications with Plaintiff.

18 10. Andrew Palmer  
19 Compliance Analyst (since June 2015)  
20 c/o Keating, Bucklin & McCormack, Inc., P.S.  
21 800 5<sup>th</sup> Avenue, Suite 4141  
22 Seattle, WA 98104  
23 206.623.8861

24 Mr. Palmer processed Pr-2016-00760 (Ms. Dalessio's request for her own records)  
25 and collected and produced documents to Ms. Dalessio. See, UW002032-002454,  
26 UW00788-UW001936.

27 11. Ana Marie Keeney  
28 Human Resources Consultant (since July 2013)  
29 c/o Keating, Bucklin & McCormack, Inc., P.S.  
30 800 5<sup>th</sup> Avenue, Suite 4141  
31 Seattle, WA 98104  
32 206.623.8861

33 Ms. Keeney located copies of notice of charge and from the Washington State

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41 SEATTLE, WASHINGTON 98104-3175  
42 PHONE: (206) 623-8861  
43 FAX: (206) 223-9423

1 Human Rights Commission (WSHRC) sent to UW HR in 2016 regarding Plaintiff's  
2 complaints WSHRC #17EZ-0220-16-7/EEOC #38G-2017-00020 and the Commission's  
3 final action finding no jurisdiction and related documents sent in 2016-2017. UW002966-  
4 UW00304.

5  
6 12. Patty Van Velsir  
7 Former Human Resources Consultant (retired 2017)  
8 Last Known Address: 527 E. Princeton Ave  
9 Fresno, CA 93704

10  
11 Ms. Van Velsir may have been copied on some public records search requests.  
12

13 13. Amy Robles  
14 Compliance Analyst (since December 2016)  
15 akrobles@uw.edu  
16 Box 356480  
17 1705 NE Pacific St  
18 Seattle, WA 98195  
19 206 221-1742

20 Ms. Robles uploaded records responsive to PR-2016-00760 (Dalessio) to the public  
21 records office on or about December 22, 2016 in response to a request from public records  
22 analyst Andrew Palmer. UW002395-UW002399.

23 Records reflect Ms. Robles received additional records that Ms. Holloway located  
24 when she was clearing out her office the last time upon retirement and forwarded on  
25 December 16, 2016. UW00265-UW002299.

26 Ms. Robles uploaded a second installment of records responsive to PR-2016-00760  
27 on or about January 6, 2017 to the public records office. See, UW002421-UW002422.  
28 Records reflect Ms. Robles obtained authorization for public records to request a snapshot  
29 of Rhoda Ashley Morrow's email account. UW002409-UW002414.

30  
31 14. Jeanie Miele  
32 Former Compliance Analyst (February 2014-October 2015)  
33 Last known address:  
34 1024 5th Ave. S. Apt. B303  
35 Edmonds, WA 98020-4088

36 Records reflect that Ms. Meile received a request to locate records responsive to PR-  
37 2015-00570 that Alison Swenson from public records sent September 16, 2015. Ms. Miele  
38 searched for a departmental representative who may be able to locate a Lab Medicine

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1 department file for Plaintiff. On September 17, 2015, Karen Holloway reported to Ms.  
2 Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so  
3 the records could be retrieved from storage in archives. On September 25, 2015, Ms. Miele  
4 received an email and attached "Julie Dalessio file" via email from Karen Holloway and  
5 forwarded the records to the public records office on September 25, 2015 and again on  
6 October 8, 2015. See, UW002003, UW002455-UW002952.

7  
8  
9 15. Cheryl Manekia  
10 Program Operations Specialist, Payroll (since August 2014)  
11 cmanekia@uw.edu  
12 Box 359555  
13 4333 Brooklyn Avenue NE  
14 Seattle, WA 98195  
15 (206) 543-8000

16 Ms. Manekia reported to public records staff Alison Swenson on April 25, 2016 that  
17 she searched and located no records of employment verification requests for Julie Dalessio  
18 or records responsive to PRR-16-00283. In September of 2015, Ms. Manakia search for and  
19 forwarded records responsive to PRR-2015-00570 from the payroll office to Ms. Swenson  
20 in the public records office. UW000392, UW001992-UW001994

21  
22 16. Odessah Visitacion  
23 Human Resources Specialist (since July 2013)  
24 206 598-9323  
25 UW Medicine HR - Business Operations  
Box 359421  
Seattle, WA 98195

26 Ms. Visitacion provided a certification on April 27, 2016 that she searched but  
27 located no records responsive to Public Records Request 16-00283 in the Medical Centers  
Human Resources Department files. UW001995.

28  
29 17. Paola M. Quinones  
30 Former Assistant to the Vice President (August 2014-February 2017)  
31 Last Known Address:  
32 16230 5TH AVE SE  
33 BOTHELL, WA 98012

34 On October 9, 2015, Ms. Quinones forwarded records responsive to PRR-2015-570  
35 from Campus Human Resources to Ms. Swenson in the public records office. On October  
36 14, 2015, Ms. Quinones forwarded documents responsive PRR-2015-570 located in the  
37 Benefits Office to Ms. Swenson in Public Records. On October 21, 2015, Ms. Quinones  
38 forwarded a document received from the DSO office responsive PRR-2015-570 to Ms.  
39 Swenson in public records. See, UW002001-UW002011.

40 On December 6, 2016, Ms. Quinones forwarded records responsive to PR-2016-  
41 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
42 DISCLOSURES - 6  
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1 00760 to public records analyst Andrew Palmer. On December 20, 2016, Ms. Quinones  
2 reported to Mr. Palmer that DSO did not have documents responsive to the request.  
3 UW002415-UW002420.

4 On April 27, 2017, Ms. Quinones reported to public records staff that the Campus  
5 Human Resources Office did not locate any records responsive to PRR-16-00283.  
6 UW001996-UW001998.

7 18. Matt Maria  
8 Former Program Coordinator, Laboratory Medicine (July 2013-December  
9 2016)  
10 Last Known Address:  
11 5507 17TH AVE S  
12 SEATTLE, WA 98108

13 Records reflect former employee Matt Maria requested a box from Records  
14 Management Services archives (#43135) on or about September 21-22, 2015 that contained  
15 Plaintiff's department file from Laboratory Medicine in response to PRR-2015-00570. The  
16 box was returned to archives on or about October 18, 2016. Records Management Services  
17 records reflect box #43135 contained "Personnel Records Terms, A-F, Year 2003".  
18 UW002966- UW002995.

19 Records reflect Mr. Maria also requested box #43135 from Records Management  
20 Services archives (#43135) on or about December 5, 2016, that the box was checked out of  
21 archives December 12, 2016 for delivery and returned to archives December 15, 2016.  
22 UW002966- UW002995.

23 Records reflect that Mr. Maria may have originally sent the department files located  
24 in box #3 ("personnel records Terms A-F 2003") from the Lab Medicine Department to  
25 Records Management Storage in 2005. UW002960-UW002964.

26 19. Tamara Schmautz  
27 Manager of Program Operations, Virology Division Administrator, Lab  
28 Medicine (since October 2013)  
29 Box 358080  
30 1100 Fairview Ave N  
31 Seattle, WA 98109-4433  
32 tschmaut@uw.edu

33 Records reflect Ms. Schmautz was asked to locate records responsive to PR-2016-  
34 00760 and that she communicated to Amy Robles on December 5, 2016 that her division  
35 did not have any records regarding Plaintiff. UW002412-UW0014.

36 20. Steven Durant  
37 Former Human Resources Department Manager/Administrator (November  
38 2015-March 2017)  
39 Last Known Address:

40 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
41 DISCLOSURES - 7  
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49 FAX: (206) 223-9423

6055 35TH AVENUE, SW # 207  
SEATTLE, WA 98126

Records reflect Mr. Durant was copied on some public records search requests related to PR-2016-00760 (Dalessio). See, UW002032-UW002040, UW002296-UW002298

21. Karen Holloway  
Former Associate Administrator, Dept. of Laboratory Medicine (retired  
January 2017)  
Last Known Address:  
6735 N. Talman Ave.  
Chicago, IL 60645

Records reflect on September 17, 2015, Karen Holloway reported to Ms. Miele that she submitted the request to a Program Coordinator (presumably Matt Maria) so the records could be retrieved from storage in archives. On September 25, 2015, Ms. Miele received an email and attached “Julie Dalessio file” via email from Karen Holloway and forwarded the records to the public records office on September 25, 2015 and again on October 8, 2015. See, UW002003, UW002455-UW002952.

Records reflect Ms. Holloway requested Plaintiff's department file from archives in December 2016 in response to Ms. Dalessio's PR-2016-760 request and subsequently forwarded a copy of Plaintiff's department file to Lauren Fischer on December 12, 2016. The documents were forwarded to Amy Robles, who uploaded them to the public records office. See, UW002032-002401. Records reflect Ms. Holloway located one more file related to Plaintiff when she was clearing out her office the last time upon retirement and she forwarded the documents to Ms. Robles, Mr. Durant, and Ms. Fischer on December 16, 2016, which was uploaded to the office of public records. UW00265-UW002299.

22. Jennifer Klohe  
HR Specialist  
klohej@uw.edu  
1959 NE Pacific St.  
Seattle, WA 98195  
206 744-9229

Ms. Klohe forwarded a copy of a November 22, 2016 letter mailed to the Human Resources office from attorney Seth Rosenberg requesting a copy of Ms. Dalessio's personnel file on her behalf to the Public Records Office on November 28, 2016 in response to a request to locate University records related to Ms. Dalessio. UW001989-001990.

23. Lauren Fischer  
Former Program Manager  
Current: Assistant Director of Business Affairs, UW Medicine  
Box 356480

DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
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1 1705 NE Pacific St  
2 Seattle, WA 98195  
206 221-1894

3 Ms. Fischer may have been copied on some public records search requests and  
4 passed on search requests from public records on to various departments.

5 24. Christine Taylor  
6 c/o Jayne L. Freeman, defense counsel  
7 Keating Bucklin & McCormack, Inc. P.S.  
8 801 Second Ave., Suite 1201  
9 Seattle, WA 98104  
10 (206)623-8861

11 Ms. Taylor may have information and knowledge regarding the University of  
12 Washington Records Management Services, and procedures for storing inactive documents,  
13 retrieving and returning boxes containing stored documents, and related paperwork, and  
14 located documents UW 2966-2995.

15 25. Marcelo Collantes  
16 Interim Director Finance & Administration, UW Medicine, Lab Medicine—Clinical  
17 Laboratory Administration  
18 c/o Jayne L. Freeman, defense counsel  
19 Keating Bucklin & McCormack, Inc. P.S.  
20 801 Second Ave., Suite 1201  
21 Seattle, WA 98104  
22 (206)623-8861

23 Mr. Collantes may have knowledge and information regarding storage of inactive  
24 Lab Medicine department files, including processes for archiving boxes of files off-site,  
25 retrieval and interim storage of boxes containing inactive department files, and security and  
26 access to stored records. See, documents UW2960-UW2965.

27 26. Daisy Rendorio  
28 Manager of Program Operations, Dept. of Lab Medicine  
29 c/o Jayne L. Freeman, defense counsel  
30 Keating Bucklin & McCormack, Inc. P.S.  
31 801 Second Ave., Suite 1201  
32 Seattle, WA 98104  
33 (206)623-8861

34 Ms. Rendorio may have information and knowledge regarding locating documents  
35 UW2960-UW2965 reflecting the Department of Laboratory Medicine requesting archive  
36 storage of two boxes of Lab Medicine personnel records, including “Box 3” containing  
37 “Personnel Records A-F from 1/1/2003-12/31/2003” in May of 2005.

38 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
39 DISCLOSURES - 9

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47 FAX: (206) 223-9423

1           **II. RULE 26(A)(1)(A)(II) A COPY—OR A DESCRIPTION BY CATEGORY AND**  
 2           **LOCATION—OF ALL DOCUMENTS, ELECTRONICALLY STORED INFORMATION,**  
 3           **AND TANGIBLE THINGS THAT THE DISCLOSING PARTY HAS IN ITS**  
 4           **POSSESSION, CUSTODY, OR CONTROL AND MAY USE TO SUPPORT ITS**  
 5           **CLAIMS OR DEFENSES, UNLESS THE USE WOULD BE SOLELY FOR**  
 6           **IMPEACHMENT:**

7           Disclosure of various documents does not reflect Defendants agreement as to  
 8           whether certain information, evidence, or issues are actually relevant or material to claims  
 9           or theories as advanced by Plaintiff or defenses necessary to respond to said claims.  
 10          Defendants reserve the right to object to discovery related to matters outside the scope of  
 11          FRCP 26, or immaterial to legal defenses and arguments upon which Defendants may rely  
 12          to defend against claims and theories set forth in Plaintiff's First Amended Complaint.

| <b>Doc. No.</b> | <b>Description</b>  | <b>Bates Range</b> | <b>Date Produced to Plaintiff in Litigation</b> |
|-----------------|---|--------------------|---|
| 1.              | Plaintiff Julie Dalessio tort claim dated October 21, 2016  | UW00001-00003      | June 1, 2017                                    |
| 2.              | PR-2015-00570 (Betz) Public Records Request 9.16.15 (for Dalessio documents) and related documents<br>Produced: 11.20.2015 and 12.4.2015                      | UW00004-000392     | June 1, 2017                                    |
| 3.              | PR-2016-00218 (Dalessio) Public Records Request 3.25.2016 (for copies of documents released to Betz) and related documents<br>Produced: 4.5.2016              | UW000393-UW000778  | June 1, 2017                                    |
| 4.              | PR-2016-00283 (Dalessio) Public Records Request 4.16.2016 (for information re who accessed her records) and related documents<br>Response: 4.27.16            | UW000779-000787    | June 1, 2017                                    |
| 5.              | PR 2016-00760 Public Records Request (Dalessio) 11.09.2016 (for her entire personnel file and related records) and related records<br>Produced: 1.26.2017 and | UW000788-001936    | June 1, 2017                                    |

27 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL

28 DISCLOSURES - 10

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| Doc. No.      | Description  | Bates Range       | Date Produced to Plaintiff in Litigation |
|---------------|--|-------------------|--|
|               | 2.15.2017  |                   |  |
| 6.            | 2003 Settlement Agreement  | UW001937-001940   | June 1, 2017                             |
| 7.            | Plaintiff Julie Dalessio Summons & Complaint served April 3, 2017  | UW001941-1980     | June 1, 2017                             |
| 8.            | Correspondence between Plaintiff Julie Dalessio and the University   | UW001981-001988   | June 1, 2017                             |
|               |  |                   |  |
| Document Name |  | Bates Range       |  |
|               | Dalessio atty duplicate PRR (UWHR)<br>Ana Marie Keeney/Patricia Van Velsir,<br>UWMC Human Resources  | UW001989-UW001990 | August 15, 2017                          |
|               | PRR #283-other correspondence (10 pp)<br>Alison Swenson<br>Odessah Visitacion<br>Cheryl Manenkia<br>Paola Quinones (on behalf of Mindy Kornberg) | UW001991-UW002000 | August 15, 2017                          |
|               | PRR #570-other correspondence (31 pp)<br>Alison Swenson<br>Paola Quinones  | UW002001-UW002031 | August 15, 2017                          |
|               | PRR #760 - processing emails<br>Andrew Palmer<br>Lauren Fisher<br>Karen Holloway<br>Amy Robles   | UW002032-UW002401 | August 15, 2017                          |
|               | PRR #760-other correspondence (21 pp)<br>Andrew Palmer<br>Amy Robles<br>Paolo Quinones   | UW002402-UW002422 | August 15, 2017                          |
|               | PRR #760-other correspondence (32 pp)<br>Andrew Palmer<br>Paola Quinones<br>Amy Robles   | UW002423-UW002454 | August 15, 2017                          |
|               |  |                   |  |
|               | PRR #760-processing emails - docs(combo)(498 pp)<br>Andrew Palmer<br>Jeanne Miele<br>Kim Williams  | UW002455-UW002952 | August 15, 2017                          |

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|   |  |                   |                 |
|---|--|-------------------|-----------------|
| 1 | Karen Holloway                                     |                   |                 |
| 2 | RCW 42.56 glossary<br>Alison Swenson/Andrew Palmer | UW002953-UW002959 | August 15, 2017 |
| 3 | Lab Med archive box requests (2015-2017)<br>(6pp)  | UW002960-UW002965 | August 15, 2017 |
| 4 | Rebecca Caulfield, Lab Medicine                    |                   |                 |
| 5 | RMS archive processing (30 pp)                     | UW002966-UW002995 | August 15, 2017 |
| 6 | Christine Taylor, UW Medicine, RMS<br>Archives     |                   |                 |
| 7 | WSHRC-EEOC documents (UWHR -<br>UCIRO copies)      | UW002996-UW003004 | August 15, 2017 |
| 8 | Ana Marie Keeney/Patricia Van Velsir,<br>UWMC HR   |                   |                 |

10           **III. RULE 26(A)(1)(A)(IV): (III) A COMPUTATION OF EACH CATEGORY OF  
11 DAMAGES CLAIMED BY THE DISCLOSING PARTY—WHO MUST ALSO  
12 MAKE AVAILABLE FOR INSPECTION AND COPYING AS UNDER RULE 34  
13 THE DOCUMENTS OR OTHER EVIDENTIARY MATERIAL, UNLESS  
14 PRIVILEGED OR PROTECTED FROM DISCLOSURE, ON WHICH EACH  
15 COMPUTATION IS BASED, INCLUDING MATERIALS BEARING ON THE  
16 NATURE AND EXTENT OF INJURIES SUFFERED**

17           Not Applicable to Defendants.

18           **IV. RULE 26(A)(1)(A)(IV) FOR INSPECTION AND COPYING AS UNDER  
19 RULE 34, ANY INSURANCE AGREEMENT UNDER WHICH AN INSURANCE  
20 BUSINESS MAY BE LIABLE TO SATISFY ALL OR PART OF A POSSIBLE  
21 JUDGMENT IN THE ACTION OR TO INDEMNIFY OR REIMBURSE FOR  
22 PAYMENTS MADE TO SATISFY THE JUDGMENT.**

23           The University of Washington and its employees, agents, and students are covered  
24 for liabilities arising from negligent acts and or omissions committed in the course and  
25 scope of their University duties. This coverage is provided through a self-funded program  
26 established pursuant to RCW 28B20.250 et seq., and governed by the Standing Orders of  
27 the Board of Regents. The liability program provides unlimited coverage, operates on an  
occurrence basis, and applies at all approved sites of practice or education.

28           At Plaintiff's request, the University has also produced to Plaintiff copies of the  
29 afore-referenced Washington statute, Board of Regents Governance Standing Orders,  
30 Chapter 5 (outlining RCW 28B.20.250) and Executive Order No. 19 (Attorney General's  
31 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
32 DISCLOSURES - 12  
33 2:17-cv-00642 TSZ

1 Division-legal procedures involving the University and its personnel), and hereby produces  
2 copies of 2018 correspondence to individual Defendants Palmer, Swenson, Saunders, and  
3 Tapper (please note: the two versions of correspondence to Mr. Tapper reflect the original  
4 correspondence that contained a mistake in the salutation, and the corrected version). See,  
5 UW004452-UW)4461, previously produced to Plaintiff on July 12, 2018.

6 DATED: July 30, 2018

7 KEATING, BUCKLIN & McCORMACK, INC., P.S.  
8

9 By: /s/ Jayne L. Freeman  
10 Jayne L. Freeman, WSBA #24318  
11 Special Assistant Attorney General for Defendants

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13 Seattle, WA 98104-3175  
14 Phone: (206) 623-8861  
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27 DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
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## **DECLARATION OF SERVICE**

I declare that on July 30, 2018, I caused a true and correct copy of the foregoing document to be served on the party listed below via email.

**Attorney for Plaintiff**

Mr. Joseph Thomas  
14625 S.E. 176<sup>th</sup> St., Apt. N-101  
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(206)390-8848  
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DATED: July 30, 2018

/s/ Jayne L. Freeman

Jayne L. Freeman

DEFENDANTS' SECOND SUPPLEMENTAL INITIAL  
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